

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-31 are pending in the application, with claims 1, 4, and 24-27 being the independent claims. Claims 1, 4, and 24-27 are sought to be amended. New claims 30 and 31 are sought to be added. Applicants reserve the right to prosecute similar or broader claims, with respect to any cancelled and amended claims, in the future. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejection under 35 U.S.C. § 101

At page 3 of the Office Action, the Examiner rejected claims 24-27 under 35 U.S.C. § 101. Applicants respectfully traverse this rejection.

Without acquiescing to the propriety of the rejection, Applicants have amended claims 24-27 for other reasons and to expedite prosecution. Claims 24-27 recite, *inter alia*, "using a processing device." Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the 35 U.S.C. § 101 rejection of claims 24-27.

Rejections under 35 U.S.C. § 103

Claims 1-6, 11, and 24-29

At page 4 of the Office Action, the Examiner rejected claims 1-6, 11, and 24-29 under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent Number 6,738,749 to Chasko ("Chasko") in view of U.S. Patent Number 6,047,270 to Joao *et al.* ("Joao"). Applicants respectfully traverse this rejection and the Response to Arguments section on page 2 of the Office Action.

Claims 1, 4, and 24-27 recite features that distinguish over the applied references. For example, claims 1, 4, 25, and 27 recite, *inter alia*, "communicating with a second authentication management apparatus of an authentication manager, wherein the second authentication management apparatus is configured to receive customer account information of an account into which the monetary amount is to be deposited," and claims 24 and 26 recite, *inter alia*, "communicating with an authentication management apparatus of an authentication manager, wherein the authentication management apparatus is configured to receive customer account information of an account into which the monetary amount is to be deposited."

Chasko describes that "[t]he POS system software validates the ***authenticity of the original purchase transaction*** by comparing the data on the customer smart card to the corresponding data record on a store controller." (Chasko, col. 4, lines 38-41.) Chasko further describes that "[p]rocess 700 is used to ***authenticate the merchant secure medium to the customer secure medium***. The POS terminal application may optionally

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be programmed to notify the operator that the customer secure medium is not loaded with the appropriate merchant application." (Chasko, col. 7, line 53 - col. 8, line 17.)

Thus, Chasko does not teach or suggest "an authentication device configured to authenticate the customer ID information and the store ID information by communicating with a second authentication management apparatus of an ***authentication manager***, wherein the second authentication management apparatus is configured to receive customer account information of an account into which the monetary amount is to be deposited," as recited by claim 1, "an authentication management apparatus that authenticates the store ID information and the customer ID information by communicating with a second authentication management apparatus of an authentication manager, wherein the second authentication management apparatus is configured to receive customer account information of an account into which the monetary amount is to be deposited," as recited by claim 4, "authenticating, using the processing device, the customer ID information and the store ID information by communicating with an authentication management apparatus of an authentication manager, wherein the authentication management apparatus is configured to receive customer account information of an account into which the monetary amount is to be deposited," as recited by claim 24, "an authentication management apparatus that authenticates the store ID information and the customer ID information by communicating with a second authentication management apparatus of an authentication manager, wherein the second authentication management apparatus is configured to receive customer account information of an account into which the monetary amount is to be deposited," as recited by claim 25, "authenticate, using the processing device, the

customer ID information and the store ID information by communicating with an authentication management apparatus of an authentication manager, wherein the authentication management apparatus is configured to receive customer account information of an account into which the monetary amount is to be deposited," as recited by claim 26, or "an authentication management apparatus that authenticates the store ID information and the customer ID information by communicating with a second authentication management apparatus of an authentication manager, wherein the second authentication management apparatus is configured to receive customer account information of an account into which the monetary amount is to be deposited," as recited by claim 27.

Rather, Chasko discloses "validating the authenticity of the original purchase transaction" using a "data record on a *store controller*" and "authentica[ting] the merchant secure medium *to* the customer secure medium" (emphasis added).

At page 6 of the Office Action the Examiner states, to which Applicants do not acquiesce, that Joao teaches "a receiver (central processing computer) configured to receive customer ID information from a mobile communication device." However, the Examiner does not use Joao to teach, nor does Joao teach, at least the above-noted distinguishing features of claims 1, 4, and 24-27. Thus, Joao cannot be used to cure the deficiencies of Chasko. Therefore, the applied references cannot be used to form a prima facie case of obviousness for claims 1, 4, and 24-27.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the 35 U.S.C. § 103(a) rejection of claims 1, 4, and 24-27 and pass these

claims to allowance. Additionally, at least based on their respective dependencies to claims 1 and 4, claims 2, 3, 5, 6, 11, 28, and 29 should be found allowable over the applied references, as well as for their additional distinguishing features.

Claims 7, 12, 16, and 20

At page 7 of the Office Action, the Examiner rejected claims 7, 12, 16 and 20 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Chasko in view of Joao, and further in view of U.S. Patent Number 4,625,276 to Benton *et al.* ("Benton"). Applicants respectfully traverse this rejection.

At page 7 of the Office Action the Examiner states, to which Applicants do not acquiesce, that Benton teaches "the use of a mobile terminal." However, the Examiner does not use Benton to teach, nor does Benton teach, at least the above-noted distinguishing features of claim 4. Thus, Benton cannot be used to cure the deficiencies of Chasko and Joao. Therefore, the applied references cannot be used to form a prima facie case of obviousness for claim 4.

Accordingly, at least based on their respective dependencies to claim 4, claims 7, 12, 16, and 20 should be found allowable over the applied references, as well as for their additional distinguishing features.

Claims 8, 13, 17, and 21

At page 8 of the Office Action, the Examiner rejected claims 8, 13, 17, and 21 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Chasko in view of Joao,

and further in view of U.S. Patent Number 6,085,176 to Woolston ("Woolston").

Applicants respectfully traverse this rejection.

At page 8 of the Office Action the Examiner states, to which Applicants do not acquiesce, that Woolston teaches "the use of a terminal at a pawnshop." However, the Examiner does not use Woolston to teach, nor does Woolston teach, at least the above-noted distinguishing features of claim 4. Thus, Woolston cannot be used to cure the deficiencies of Chasko and Joao. Therefore, the applied references cannot be used to form a *prima facie* case of obviousness for claim 4.

Accordingly, at least based on their respective dependencies to claim 4, claims 8, 13, 17, and 21 should be found allowable over the applied references, as well as for their additional distinguishing features.

Claims 9, 14, 18, and 22

At page 8 of the Office Action, the Examiner rejected claims 9, 14, 18, and 22 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Chasko in view of Joao, and further in view of U.S. Patent Number 6,012,048 to Gustin *et al.* ("Gustin"). Applicants respectfully traverse this rejection.

At page 9 of the Office Action the Examiner states, to which Applicants do not acquiesce, that Gustin teaches "the use of a lottery money-exchanging booth." However, the Examiner does not use Gustin to teach, nor does Gustin teach, at least the above-noted distinguishing features of claim 4. Thus, Gustin cannot be used to cure the

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deficiencies of Chasko and Joao. Therefore, the applied references cannot be used to form a prima facie case of obviousness for claim 4.

Accordingly, at least based on their respective dependencies to claim 4, claims 9, 14, 18, and 22 should be found allowable over the applied references, as well as for their additional distinguishing features.

Claims 10, 15, 19, and 23

At page 9 of the Office Action, the Examiner rejected claims 10, 15, 19 and 23 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Chasko in view of Joao, and further in view of U.S. Patent Number 6,266,647 to Fernandez ("Fernandez"). Applicants respectfully traverse this rejection.

At page 9 of the Office Action the Examiner states, to which Applicants do not acquiesce, that Fernandez teaches "the use of a Panchinko parlor." However, the Examiner does not use Fernandez to teach, nor does Fernandez teach, at least the above-noted distinguishing features of claim 4. Thus, Fernandez cannot be used to cure the deficiencies of Chasko and Joao. Therefore, the applied references cannot be used to form a prima facie case of obviousness for claim 4.

Accordingly, at least based on their respective dependencies to claim 4, claims 10, 15, 19, and 23 should be found allowable over the applied references, as well as for their additional distinguishing features.

New Claims 30 and 31

New claims 30 and 31 depend from claim 1 and include all features therein. Thus, at least based on their respective dependencies to claim 1, claims 30 and 31 should be found allowable over the applied references.

Additionally, claims 30 and 31 recite additional features that distinguish over the applied references. For example, claim 30 recites, *inter alia*, "an opening of the authentication management apparatus that is configured to receive the customer mobile communication device," and claim 31 recites, *inter alia*, "The authentication management apparatus of claim 30, wherein the customer mobile communication device is a mobile phone."

Accordingly, claims 30 and 31 should be found allowable over the applied references.

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Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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